November 20, 2008

FINDING OF NO SIGNIFICANT IMPACT

TO ALL INTERESTED GOVERNMENTAL AGENCIES AND PUBLIC GROUPS

As required by state and federal rules for determining whether an Environmental Impact Statement is necessary, an environmental review has been performed on the proposed action below:

Project	Bigfork Mayport Harbor Collection System Extension
Location	Bigfork, Montana
Project Number	C302205-01
Total Cost	$920,000

From the 2005 Preliminary Engineering Report, the Bigfork Water & Sewer District has identified the need to extend the wastewater collection system to the Mayport Harbor area. Mayport Harbor is a recently annexed subdivision that relies on older, individual on-site septic systems for wastewater treatment and disposal. Due to their close proximity to the lake and site conditions, there is concern over the negative impacts these systems are having on the water quality of the Flathead River and Lake. Many of the systems in Mayport Harbor do not meet current standards for septic tank installations and are not providing the level of treatment needed to protect the water quality of Flathead Lake and groundwater.

The proposed sewer extension to serve the Mayport Harbor area will require the installation of approximately 3,600 feet of 8-inch main, a new lift station, and forcemain. The new forcemain will tie into the existing gravity sewer main south of the subdivision. The wastewater will receive treatment at the Bigfork Wastewater Treatment Facility which, in addition to its more advanced biological treatment, utilizes chemical phosphorous removal, filtration, and ultraviolet disinfection to protect the receiving waters.

Federal and State grant/loan programs will fund the project. Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species, and historical sites are not expected to be adversely impacted as a result of the proposed project. Public participation during the planning process demonstrated support for the selected alternative. No significant long-term environmental impacts were identified. An environmental assessment (EA), which describes the project and analyzes the impacts in more detail, is available for public scrutiny on the DEQ web site (http://www.deq.mt.gov/ea.asp) and at the following locations:

Department of Environmental Quality
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901
mabrahamson@mt.gov

Bigfork Water and Sewer District
P.O. Box 1108
Bigfork, MT 59911

Comments on the EA may be submitted to the Department of Environmental Quality at the above address. After evaluating comments received, the department will revise the environmental assessment or determine if an environmental impact statement is necessary. If no substantive comments are received during the comment period, or if substantive comments are received and evaluated and the environmental impacts are still determined to be non-significant, the agency will make a final decision. No administrative action will be taken on the project for at least 30 calendar days after release of the Finding of No Significant Impact.

Sincerely,

_____

Todd Teegarden, Bureau Chief
Technical and Financial Assistance Bureau
Planning, Prevention & Assistance Division

BIGFORK MAYPORT HARBOR COLLECTION SYSTEM EXTENSION

ENVIRONMENTAL ASSESSMENT

I. COVER SHEET

A. PROJECT IDENTIFICATION

Applicant: Bigfork County Water & Sewer District

Address: PO Box 1108
Bigfork, MT 59911

Project Number: C302205-01

B. CONTACT PERSON

Name: Julie Spencer, District Manager

Address: PO Box 1108
Bigfork, MT 59911

Telephone: (406) 837-4566

C. ABSTRACT

The Bigfork Water & Sewer District, through its 2005 Preliminary Engineering Report (PER), has identified the need to expand the wastewater collection system to the Mayport Harbor area. Mayport Harbor is a recently annexed subdivision that relies on individual on-site septic tanks and drainfields for wastewater treatment and disposal. A concern for the District is that the on-site septic systems are a non-point source of pollution to Flathead Lake due to the high groundwater levels in the area and its proximity to Flathead Lake and Flathead River. The Flathead County Public Health Department has indicated that the Mayport Harbor area has some limiting conditions for the installation of septic systems. Most of the drainfields are shallow capped due to groundwater and some lots do not have replacement areas if the drainfields do fail. The septic systems contribute significant quantities of nitrogen and phosphorous to the groundwater system which is hydrologically connected to Flathead River and Flathead Lake. By extending the Bigfork collection system to this area, these nutrient loads will be significantly reduced. The wastewater will receive treatment at the Bigfork Wastewater Treatment Facility, which in addition to its more advanced biological treatment utilizes chemical phosphorous removal and ultraviolet disinfection. The proposed sewer extension to serve the Mayport Harbor area will require the installation of approximately 3,600 feet of 8-inch main, a new lift station, and forcemain. The new forcemain will tie into the existing gravity sewer main south of the subdivision.

Federal and State grant/loan programs will fund the project. The improvements

are estimated to cost approximately $920,000. It is anticipated that the project will be funded through District reserves, a low interest loan (3.75%) obtained from the State Revolving Fund (SRF) loan program, and a grant from TSEP.

Environmentally sensitive characteristics such as wetlands, floodplains, threatened or endangered species, and historical sites are not expected to be adversely impacted as a result of the proposed project. Additional environmental impacts related to land use, water quality, air quality, public health, energy, noise, growth, and sludge disposal were also assessed. No significant long-term environmental impacts were identified.

Under Montana law, (75-6-112, MCA), no person may construct, extend, or use a public sewage system until the DEQ has reviewed and approved the plans and specifications for the project. Under the Montana Water Pollution Control State Revolving Fund Act, the DEQ may loan money to municipalities for construction of public sewage systems.

The DEQ, Technical and Financial Assistance Bureau, has prepared this Environmental Assessment to satisfy the requirements of the Montana Environmental Policy Act (MEPA) and the National Environmental Policy Act (NEPA).

D. COMMENT PERIOD

Thirty (30) calendar days

II. PURPOSE OF AND NEED FOR ACTION

Flathead Lake has an A-1 classification for water quality, which is the highest classification in the State. In an effort to maintain and restore this high quality water body, there have been several water quality studies of the lake, which evaluated the impacts of nitrogen and phosphorous loading to the lake, and its impacts to aquatic life. These studies have shown that phosphorous is a critical nutrient in algae growth in the lake. As a result of these studies the State has imposed stringent phosphorous limitations on point source discharges around the lake. The studies have also shown that non-point sources such as septic systems are a major contributor to the degradation of the Lake's water quality as well.

The Bigfork Water and Sewer District recently annexed the Mayport Harbor area. Mayport Harbor was developed in the 70's and there are approximately 23 residences relying on older septic systems for wastewater treatment and disposal. Due to their close proximity to the lake and site conditions, there is concern over the negative impacts these systems are having on the water quality of the Flathead River and Lake. Montana has adopted standards for protecting surface and ground waters from degradation. For groundwater, subsurface disposal systems must meet a limitation of 50 years for phosphorous breakthrough to the nearest surface waters. An analysis of the cumulative phosphorous impacts from the drainfields at Mayport Harbor show that several of the lots are failing in their allowable time to breakthrough. The phosphorous breakthrough analyses for drainfields with cumulative impacts (overlapping mixing

zones) were calculated at 32.7 years and 42.6 years. In addition, most of the drainfields are shallow capped due to high groundwater and some lots do not have replacement areas when the drainfields do fail. According to the Flathead County Public Health Department many of the systems in Mayport Harbor do not meet current standards for septic tank installations and are not providing the level of treatment needed to protect the water quality of Flathead Lake and local groundwater.

To reduce nutrient loads to the river and lake, the PER recommends extending the Bigfork District's collection system to the Mayport Harbor area. The sewer extension will require the installation of approximately 3,600 feet of 8-inch main, a new lift station, and force main. The new force main will tie into the existing gravity sewer main south of the subdivision. The wastewater will receive treatment at the Bigfork Wastewater Treatment Facility which, in addition to its more advanced biological treatment, utilizes chemical phosphorous removal, filtration, and ultraviolet disinfection to protect the receiving waters. It should be noted that in the future, the Flathead Lake TMDL and associated MPDES permit effluent limits may require supplementary upgrades to the District's secondary treatment system for additional removal of nutrients.

III. ALTERNATIVES INCLUDING THE PROPOSED ACTION

A. Six alternatives for providing sewer service to the Mayport Harbor area were evaluated in the PER. The collection system alternatives evaluated included:

1. No Action
2. Gravity Sewer System
3. Gravity Sewer System with Lift Station
4. Small Diameter Gravity Effluent Sewer
5. Septic Tank Effluent Pump System (STEP)
6. Grinder Pump Pressure Sewers

1. NO ACTION - The no-action alternative would result in the continued use of individual on-site septic systems in the Mayport Harbor area. Many of these existing septic systems are not meeting current standards and will continue to serve as a non-point source of pollution to the Lake. In addition, as the area becomes more developed the pollution to the groundwater and ultimately Flathead Lake would increase. Based on these concerns the No-Action alternative was not considered to be a viable option.

2. GRAVITY SEWER SYSTEM – This alternative consists of construction of a gravity sewer main system for Mayport Harbor. This sewer main would run from the subdivision to Holt Drive and connect to the existing gravity system south of the subdivision. Unfortunately a gravity main along Holt Drive is not technically feasible as it would be too deep to connect to the existing gravity system. Therefore this alternative is not a viable option.

3. GRAVITY SEWER SYSTEM WITH LIFT STATION – This alternative would be similar to alternative 2 with the addition of a new lift station at the intersection of Holt Dr. and Siderius Lane. The force main from the lift station

would tie into the existing gravity system south of the subdivision which flows to the Bigfork wastewater treatment plant via the Eagle Bend lift station.

4. SMALL DIAMETER GRAVITY EFFLUENT SEWER – This alternative consists of a gravity sewer line and the installation of a new watertight septic tank for each home. From the septic tank, effluent would flow by gravity to Holt Drive and would be pumped via a lift station located at the intersection with Siderius Lane, to the existing gravity system south of the subdivision. Since solids are removed in the septic tanks smaller diameter gravity mains (4-inches) would be installed. Septic tanks must be pumped occasionally to remove the sludge.

5. SEPTIC TANK EFFLUENT PUMP SYSTEM (STEP) – This alternative would involve the installation of new watertight septic tank/pump station for each home. New tanks would be required to accommodate the pumps and minimize the potential adverse effects of groundwater. Effluent would be pumped from each home through a common pressure main to the gravity main south of the subdivision. Since solids would be removed in the septic tanks smaller diameter force mains, 1½ to 2 inches would be utilized. Septic tanks must be pumped occasionally to remove the sludge.

6. GRINDER PUMP PRESSURE SEWERS - This alternative is similar to alternative 5, but would involve the construction of a grinder pump station for each home, eliminating the need for septic tanks. From each pump station, the effluent will be conveyed via a force main and tie into the gravity main south of the subdivision. The grinders would allow a smaller diameter force mains of 1½ to 2 inches to be utilized. A specially designed concrete anchoring system would be required for each grinder pump station to counteract the buoyant forces of the groundwater.

B. COST COMPARISON PRESENT WORTH ANALYSIS

The present worth analysis is a means of comparing alternatives in present day dollars and can be used to determine the most cost-effective alternative. An interest rate of 6.0% over the 20-year planning period was used in the analysis. Table 1 provides a summary of the present worth analysis of alternatives considered. Although alternative 3 does not have the lowest capital construction cost, its lower O&M costs result in alternative 3 having the lowest present worth cost.

Table 1
ECONOMIC EVALUATION OF TREATMENT AND DISPOSAL ALTERNATIVES

ITEM	ALT 1	ALT 2	ALT 3	ALT 4	ALT 5	ALT 6
	No Action	**Gravity Sewer System**	**Gravity Sewer System with Lift Station**	**Small Diameter Gravity Effluent Sewer**	**Septic Tank Effluent Pump System (STEP)**	**Grinder Pump Pressure Sewers**
Capital Costs	N/A	N/A	$712,800	$793,200	$582,000	$566,100
Annual O&M Cost	N/A	N/A	$36,200	$51,400	$114,200	$99,000
Present Worth of Annual O&M Costs (6%)	N/A	N/A	$415,200	$589,600	$1,309,900	$1,135,500
Present Worth Cost	**N/A**	**N/A**	**$1,128,000**	**$1,382,800**	**$1,891,900**	**$1,701,600**

C. BASIS OF SELECTION OF PREFERRED ALTERNATIVE

Selection of the preferred alternative was based upon several criteria, both monetary and non-monetary. The ranking criteria considered are shown in Table 2. Each alternative was assigned a numerical value of -1, 0, or +1 for each category. A “-1” rating indicates a potentially negative impact, a “0” rating indicates no impact, and a “+1” indicates a potentially positive impact. As shown in the ranking criteria matrix, alternative 3 ranked the highest, primarily due to cost and operational ease. Based on the overall score, alternative 3, a gravity sewer system with lift station, was selected to provide sewer service to the Mayport Harbor area.

The estimated administration, design and construction cost for the recommended alternative (Alternative 3) is $920,000. The District will take out a $460,000 State Revolving Fund (SRF) loan at 3.75% interest rate for 20 years to complete the project. The project will result in a user rate of approximately $121.55 per month per property within the SID. This rate is 448% of the target sewer rate for the Mayport Harbor area property owners.

Table 2 RANKING CRITERIA FOR COLLECTION SYSTEM ALTERNATIVES				
Criteria	**Alt 3: Gravity Sewer System with Lift Station**	Alt 4: Small Diameter Gravity Effluent Sewer	Alt 5: Septic Tank Effluent Pump System (STEP)	Alt 6: Grinder Pump Pressure Sewers
Public Health and Safety	**+1**	+1	+1	+1
Technical Feasibility	**+1**	+1	+1	+1
Environmental Impact	**+1**	+1	+1	+1
Public Opinion	**+1**	0	0	0
Operations	**+1**	0	-1	-1
Cost	**+1**	-1	-1	-1
Total	**+6**	+2	+1	+1

The financial impact of this project on the system users is shown in Table 3. Based on the EPA guidance for project affordability, the proposed project will result in a monthly cost per household that is 4.0% of the monthly median household income, and therefore may impose an economic hardship on household income for some residents.

Table 3 PROJECT AFFORDABILITY	
Total monthly debt service and O&M cost[1]	$121.55
Monthly median household income (mMHI)[2]	$3,010.00
User rate as a percentage of mMHI	4.0 %

[1] Bigfork W&S District Uniform Application Form
[2] Based on 2000 census data

IV. AFFECTED ENVIRONMENT

A. PLANNING AREA

Bigfork is located on the north shore of Flathead Lake along Highway 35 in Flathead County (See Figure 1). Water and sewer services for the Bigfork community are provided through a County Water and Sewer District.

The Bigfork County Water & Sewer District encompasses the community of

Bigfork and the recreational communities of Eagle Bend and Harbor Village. The District boundaries are shown in figure 2. Within the District, there are residents who are not served by the central sewer system including the Mayport Harbor area, which is a developed area located along the western edge of the District boundary, next to the Flathead River (see Figure 2). In this area, sewer service is provided by onsite septic tanks and drainfields for wastewater treatment and disposal. This project involves expanding the wastewater collection system to the Mayport Harbor area and treating the wastewater in the District's wastewater treatment facility, which will provide a significantly higher level of treatment than septic tanks. The project will take approximately three months to construct following system design and approval. Construction is scheduled to begin in the February of 2009 when the groundwater level is the lowest.

B. FLOW PROJECTIONS

It is estimated that the Mayport Harbor area will generate approximately 6,000 gallons per day of domestic strength wastewater. The District's wastewater treatment facility is designed to treat an average daily flow of 500,000 gpd. The current average flow to the wastewater treatment facility is approximately 221,000 gallons per day so the existing facility appears to have the needed capacity to treat the additional flow from Mayport Harbor and not negatively impact operations.

An assessment of the Mayport Harbor flows and loads on the non-degradation load limits in the Bigfork WWTF's discharge permit were also evaluated. Taking into account current treatment levels and adding the contribution from Mayport Harbor (assuming similar levels of treatment would be achieved) the BOD load is only at 6.5% of the permissible non-degradation load limit, TSS is at 8.2% of the permissible load, TP is at 12% of the permissible load, and TN is at 28% of the permissible load. Therefore connecting Mayport Harbor to the sewer system should not result in any permit issues.

C. NATURAL FEATURES

The Bigfork service area overlies mountainous terrain and glacial outwash from the Swan glacier. The Swan and Flathead River systems influence the development patterns of the District. The Swan River divides the south portion of the District and is an obstacle to providing infrastructure service to this portion of the District. Landforms on both sides of the river are mountainous. The channel valley is narrow with steep cobbley soils. The Flathead River forms the west boundary of the District. Soils in the westerly part are river sediments deposited as floodplain soils of the Flathead River. Some areas of the District are within the 100-year floodplain. Between the two rivers and mountainous areas to the east are low-lying areas adjoining Flathead Lake with higher benches overlooking Flathead Lake.

Throughout the District, depth to groundwater varies, generally following the river or lake elevations. In low areas groundwater is within two to three feet of the surface usually from May to October. Mountain areas are characterized as

fractured bedrock with groundwater. Typically, groundwater quantity is relatively high in areas with coarse soils. Sediments are fine grained and water production is limited along the Flathead River. Areas north of the District are underlain by a deep artesian aquifer, which is comprised of coarse sands and gravels. Production from this aquifer can be as great as 1,000 gallons per minute.

The Bigfork area climate is classified as a modified pacific maritime type. The major influence is easterly moving Pacific air masses. Occasionally, in winter, polar continental air masses will spill westward over the Continental Divide. This polar air brings periods of very cold continental type weather. The planning area climate is also influenced by its proximity to Flathead Lake. Temperature fluctuation within several miles of the lakeshore is modified and reduced by the large body of water. The average precipitation is 22.38 inches.

Flathead Lake is classified as an A-1 waterbody. Waters classified A-1 are suitable for drinking, culinary, and food processing purposes after conventional treatment for removal of naturally present impurities. It is also considered suitable for bathing, swimming and recreation; growth and propagation of salmonoid fishes and associated aquatic life, waterfowl, and furbearers; and agricultural and industrial water supply.

D. MAPS

Bigfork is located on the north shore of Flathead Lake along Highway 35 in Flathead County (see Figure 1). The district boundary, planning area and project location are shown in Figure 2. This project involves extending the Bigfork District's wastewater collection system to the Mayport Harbor area as shown in Figure 3.

V. ENVIRONMENTAL IMPACTS OF PROPOSED PROJECT

A. DIRECT AND INDIRECT ENVIRONMENTAL IMPACTS

1. Land Use – Land use in the area will not change as a result of this project. The project will be constructed within existing road right of way and will not impact agricultural lands. The lift station will be built on a Mayport Harbor common area located at the intersection of Holt Drive and Siderius Lane.

2. Floodplains and Wetlands – Floodplain maps of the Mayport Harbor area show most of project area lies outside of the 100-year floodplain. Areas immediately adjacent to the river water are within 100-year floodplain. Wetlands have not been delineated within the project area. If wetlands are discovered during design, the appropriate permits will be obtained for work in and around wetlands. The Department of Natural Resources (floodplains) and Army Corps of Engineers (wetlands) have been notified of this project and asked to reply with any concerns.

3. Cultural Resources – No impacts to cultural resources are anticipated.

The State Historic Preservation Office (SHPO) reviewed the proposed project. According to their records, there have been a few previously recorded sites and few cultural resources done within the search area. SHPO stated that there was a low likelihood that cultural properties would be impacted by this project and as such, felt a cultural resource inventory is unwarranted at this time.

4. Fish and Wildlife – Animal life will not be significantly affected by the proposed project. The project will not affect any wildlife habitats, nor will any known endangered species be affected. The proposed project has water quality benefits that will protect and reduce the risk of harm to fisheries and other animals. The Montana Department of Fish, Wildlife, and Parks and U.S. Fish and Wildlife Services have been notified of this project and asked to reply with any concerns.

5. Water Quality - Due to the close proximity of the Mayport Harbor subdivision to surface water and site conditions, there is concern over the negative impacts that the existing septic systems are having on the water quality of the Flathead River and Lake. Many of the existing septic systems in the Mayport Harbor area do not meet the State standards for protecting groundwater and surface water from degradation (e.g., most do not meet the phosphorous breakthrough requirement of 50 years) and do not have land available for replacement areas when they fail. Eliminating the use of these septic systems will result in the reduction of pathogen and nutrient loadings to groundwater and ultimately to the lake improving water quality. By sending the effluent to the Bigfork WWTF the effluent will receive enhanced treatment, which includes phosphorous removal and disinfection.

6. Air Quality - Short-term negative impacts on air quality are expected to occur during construction from heavy equipment in the form of dust and exhaust fumes. Proper construction practices will minimize this problem. Project specifications will require dust control.

7. Public Health - Public health and safety will greatly improve because an adequate sewer collection will be provided to the Mayport Harbor area, reducing the potential to pollute ground and surface waters. The project will eliminate the continued use of septic systems which are not providing adequate treatment (phosphorous breakthrough) and when they fail will result in the surfacing of wastewater in residential areas. The collected wastewater will also receive a significantly higher level of treatment in the District's wastewater treatment plant which includes disinfection.

8. Energy – No appreciable change in energy consumption is anticipated. There will be some power requirements for operation of the lift station; however, this usage is considered minimal. The impact of this additional energy consumption will be minimized as much as possible through the use of energy efficient pumps. The consumption of energy resources directly associated with construction of the recommended improvements

is unavoidable but will be a short-term commitment.

9. Noise - Short-term impacts from excessive noise levels may occur during the construction activities. The construction period will be limited to normal daytime hours to avoid early morning or late evening construction disturbances. No significant long-term impacts from noise will occur.

10. Sludge Disposal - As part of this project, individual septic tanks will be abandoned in areas where service lines are extended. The existing septic tanks will be pumped and abandoned by filling them with clean fill material. A licensed septic tank pumper will be contracted to pump each tank. The septage will be disposed of in accordance with EPA's 503 regulations. In Flathead County, the majority of septic tank waste is land applied and incorporated into soil at a farm field near Columbia Falls.

11. Growth – The proposed project involves extending sewer service to an existing subdivision. There should be no impacts to growth of the community or any related secondary impacts such as solid waste, transportation, schools, utilizes, etc., since the area is already developed with residential homes.

12. Cumulative Effects - No significant adverse impacts are anticipated.

B. UNAVOIDABLE ADVERSE IMPACTS

Short-term construction related impacts (i.e., noise, dust, traffic disruption, etc.) will occur, but should be minimized through proper construction management. Energy consumption during construction cannot be avoided.

VI. PUBLIC PARTICIPATION

Public participation for this project included a meeting on November 12, 2008. At the public meeting, the need for the project, recommended alternative, and scheduling were discussed. Cost estimates for the project and proposed sewer rates were presented as well. Discussions included: the higher estimated construction costs, updating homeowners that are located out of town, what homeowners can do if they do not want to be part of the project (30-day protest period), and the installation cost of sewer service lines since they have been removed from the project. A survey conducted by the Mayport Harbor Homeowners Association (MHHA) indicated overwhelming support for the project from the homeowners within the proposed SID, but the MHHA plans to have a meeting discussing the changes of the projects before the 30-day protest period begins on November 19, 2008. Concerns were voiced over the out of pocket costs to abandon septic tanks and install their own service lines. The project can not begin until the Bigfork Water and Sewer District passes a Resolution of Intent to create a Special Improvement District, which is planned to take place on December 22, 2008.

VII. AGENCY ACTION, APPLICABLE REGULATIONS AND PERMITTING AUTHORITIES

No additional permits will be required from the State Revolving Fund (SRF) section of the DEQ for this project after the review of the submitted plans and specifications. However, coverage under the storm water general discharge permit is required from the DEQ Water Protection Bureau prior to the beginning of construction.

VIII. RECOMMENDATION FOR FURTHER ENVIRONMENTAL ANALYSIS

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

Rationale for Recommendation: Through this EA, the DEQ has verified that none of the adverse impacts of the proposed Bigfork Collection System Expansion project are significant. Therefore, an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607, 17.4.608, 17.4.609, and 17.4.610. The EA is the appropriate level of analysis because none of the adverse effects of the impacts are significant.

IX. REFERENCE DOCUMENTS

The following documents have been utilized in the environmental review of this project and are considered to be part of the project file:

1. Preliminary Engineering Report Bigfork County Water and Sewer District Mayport Harbor, 2005, prepared by Thomas, Dean, and Hoskins, Inc.
2. Uniform Application Form for Montana Public Facility Projects for the Bigfork Water and Sewer District (Mayport Harbor), September 2008 prepared by the Bigfork County Water and Sewer District.
3. Miscellaneous Correspondence – Bigfork Mayport Harbor, September - November 2008 prepared by Morrison-Maierle, Inc.

X. AGENCIES CONSULTED

The following agencies have been contacted in regard to the proposed construction of this project:

1. The U.S. Fish and Wildlife Service reviewed the proposed project and determined that this project is unlikely to have to any significant adverse effects upon fish, wildlife, or habitat resources.

2. The Montana Department of Natural Resources and Conservation (DNRC) was contacted on 3/30/04 and again on 7/17/08 regarding impacts to the floodplain due to the proposed project. No comments were received from the DNRC.

3. The Montana Historical Society's State Historic Preservation Office (SHPO) reviewed the proposed project. According to their records, there have been a few previously recorded sites and a few cultural resource inventories done within the designated search locales. SHPO stated that as long as there will be no

disturbance or alteration to structures over fifty years of age they feel that there is a low likelihood that cultural properties would be impacted and, as such, felt a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or cultural materials be inadvertently discovered during the project, SHPO must be contacted and the site investigated.

4. The U.S. Department of the Army Corps of Engineers (USCOE) was contacted on 3/30/04, and again on 7/17/08 regarding impacts to wetlands due to the proposed project. No comments were received from the USCOE.

5. The Montana Department of Fish, Wildlife and Parks was contacted on 3/30/04, and again on 7/17/08 regarding any impacts to threatened or endangered species due to the proposed project. No comments were received from the DFWP.

EA Prepared by:

Mike Abrahamson, P.E. Date

EA Reviewed by:

Jerry Paddock, P.E. Date